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April 24, 2020

VIA ECF

Magistrate Judge Steven L. Tiscione United States District Court 225 Cadman Plaza East Courtroom N504, Chambers Room N503 Brooklyn, NY 11201 JONATHAN L. MARKS jonathan.marks@kattenlaw.com 312.902.5337 direct 312.577.1061 fax

Re: State Farm Mut. Auto. Ins. Co., et al. v. Parisien, et al., No. 1:18-cv-00289 – Notice of Settlement Discussions

Dear Judge Tiscione:

Plaintiffs State Farm Mutual Automobile Insurance Company and State Farm Fire and Casualty Company (together, the "State Farm Entities") respectfully write on behalf of the State Farm Entities and the Professional Defendants,¹ the Rybak Defendants,² the DME Defendants,³ and Buslon and Masigla⁴ to notify the court that the parties in the above-referenced action have entered into settlement discussions. The parties have proposed that, for a period of 30 days, they refrain from engaging in any discovery or motion practice in order to focus on resolving their disputes in good faith. This 30-day "stand down" will further relieve the Parties from the time, costs, and burden of complying with their respective discovery and motion practice obligations during settlement discussions and preserve the Parties' and the Court's resources. The parties will promptly notify the Court if the matter is settled, and if it is not by the conclusion of the 30-day period, then they will promptly file a status report.

Respectfully submitted,

/s/ Jonathan Marks

Jonathan L. Marks

¹ "Professional Defendants" refers to the following defendants: Francois Jules Parisien, M.D. Luqman Dabiri, M.D. Ksenia Pavlova, D.O., Frances Lacina, D.O., Allay Medical Services, P.C., FJL Medical Services, P.C., JFL Medical Care P.C., JPF Medical Services P.C., KP medical Care P.C., PFJ Medical Care P.C., RA Medical Services P.C., Darren Mollo D.C., Darren Mollo D.C., P.C., ACH Chiropractic, P.C., Energy Chiropractic P.C., Island Life Chiropractic Pain Care, PLLC, Charles Deng, L.A.c., Charles Deng Acupuncture, P.C., David Mariano, P.T. and MSB Physical Therapy P.C..

² The "Rybak Defendants" refers to Tatiana M. Rybak and Oleg Rybak.

³ The "DME Defendants" refers to the following defendants: Maiga Products Corporation, Madison Products of USA, Inc., Quality Health Supply Corp., Personal Home Care Products Corp., and AB Quality Health Supply Corp..

⁴ Buslon refers to Allan L. Buslon and Masigla refers to Maria Masigla a/k/a Maria Shiela Buslon P.T..